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84 Woosamonsa Road
Pennington, NJ 08534
29 August 1998

FCC Secretary,
Magalie Roman **Salas**
Office of the Secretary
Federal Communications Commission
1919 "M" Street N.W., Room 222
Washington, DC 20554

To the FCC Commissioners:

In the matter of the 1998 biennial Regulatory Review - Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143:

I have been a ham since 1972, have held an Extra Class license since 1978 and have been a Volunteer Examiner with the ARRL since 1985. I have taught innumerable ham classes to students from 7 to 88 years of age in this area since 1975 and I am 70 years old. I spend at least 50% of my air time using code.

With respect to the code requirements, I favor lowering the code requirements for General Class to about 5 or 10 wpm, perhaps a compromise at 7 wpm. I favor lowering the Extra Class code test to 12 or 13 wpm. As a VE, I feel that the code tests should emphasize comprehension (the "real world") rather than perfection and thus would like to see the tests continue to be the multiple choice type that I have been using for many years.

With respect to frequency privileges, I would like to see an expansion of the frequencies available for SSB at the expense of CW frequencies, many of the latter being vastly underused. I would like to see some expansion of space, SSB and CW, for the expected additional numbers of new Extra Class operators, perhaps another 5 or 10 kHz in each band edge.

With respect to doctors' certifications to excuse those with disabilities from higher speed CW exams, as a VE I have not seen many of these in 13 years, but probably 30-50% of those I have seen seem to show that the doctor had no idea of what were acceptable disabilities, but merely took the patient's word that he was having trouble passing the code test. On the other hand, I don't feel that a few slipping through the system will really make much difference, especially when we are talking about lowering (eliminating?) the CW requirements.

With respect to the written exams, I feel that they should be kept quite broad in scope. Maybe I don't use some of the more "up-to-date" technologies today, but who knows what my interests may be next year. In terms of the exams themselves, as a VE I would not like to go to any essay-type exams when it comes to having to correct them.

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With respect to phasing out the Novice Class, in practice that has already almost happened. I don't remember when we gave the last Novice Exam.

With respect to allowing Advanced Class operators to administer General Class exams, it really is of little **help** to most of us. If we accept walk-ins, we have to have an all-Extra Class VE team in case we get someone coming in for the Extra Class exam.

Sincerely,

A handwritten signature in cursive script that reads "Don Wright".

Don Wright/AA2F

cc: ARRL